



646-289-5276



djaney@thejaneylawfirm.com



The Janey Law Firm P.C.  
111 Broadway, Suite 701, New York, NY 10006

April 11, 2024

**VIA ECF**

The Honorable Judge J. Paul Oetken  
United States District Court—Southern District  
of New York  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2101  
New York, New York 10007

**Re: *SEC v. Govil, No. 21 cv 6150 (JPO)***

Dear Judge Oetken:

This law firm represents the defendant, Aron Govil, in the above-referenced action. Pursuant to Your Honor's Order at ECF No. 37, we write jointly with the Securities and Exchange Commission (the "SEC") to provide a status update.

As directed, the parties have conferred regarding further proceedings in this matter. The SEC's position is that limited discovery is appropriate to develop the record as to the issues the Second Circuit remanded to the District Court, *i.e.*, the determination of pecuniary harm and the valuation of the securities surrendered by Defendant. Mr. Govil is willing to agree to the proposed discovery schedule set forth below, notwithstanding his position that there is sufficient information on the existing record to determine the pecuniary harm and valuation issues.

To the extent that the Court is inclined to proceed with setting a discovery schedule, the parties jointly propose the following schedule.

- Limited Fact Discovery: To be completed by July 1, 2024;
- Expert Reports: To be served by September 30, 2024;
- Rebuttal Expert Reports, if any: To be served by October 30, 2024;
- Expert Discovery (e.g., depositions): To be completed by November 15, 2024;
- Following the close of Expert Discovery, the parties would meet and confer concerning a proposed briefing schedule and remedies hearing, if needed.

Finally, Mr. Govil believes that it would be worthwhile to learn the Court's perspective on the issues the Second Circuit remanded to it so that the parties can (a) better understand and incorporate Your Honor's views as to the most effective and efficient means to address the pecuniary harm and valuation issues, and (b) tailor their discovery efforts accordingly.

For the foregoing reasons, Mr. Govil respectfully requests that the Court either set a date for a conference in this matter or, alternatively, if the Court deems a conference unnecessary, the parties request that the Court order the proposed discovery schedule set forth above.

Respectfully submitted,

/s/ Derrelle M. Janey

Derrelle M. Janey  
Counsel for Defendant Aron Govil

/s/ David Zetlin-Jones

David Zetlin-Jones  
Counsel to the SEC

cc: By ECF to all counsel of record

